

FILED

FEB 02 2021

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

WILLIAM F. KATZ
#11350-067 ESSEX COUNTY Jail
354 DOREMIUS AVE
NEWARK NJ 07501

United States of America
✓
WILLIAM F. KATZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT PENNSYLVANIA

CASE NO: 2:20-CR-01090
MOTION TO CEASE AND DESIST
MOTION TO DISMISS FOR
VIOLATION OF 6TH AMENDMENT
AND SPEEDY TRIAL ACT
EMERGENCY CIRCUMSTANCES

#10 OF STANDING
ORDER

Fed. R. Crim. P. R.12 (b)(3)(A)(ii)

TO: GOODMAN U.S. ATTORNEY
UNITED STATES DISTRICT COURT
WESTERN DISTRICT PENNSYLVANIA
JOSEPH F. LEIS JR. U.S. COURTHOUSE
700 GRANT STREET SUITE 4000
PITTSBURGH PA 15219

I WILLIAM F. KATZ, MOVES FOR A CEASE AND DESIST OF
PROSECUTION ORDER AND TO DISMISS CASE BECAUSE
OF VIOLATIONS OF MY CONSTITUTIONAL
GUARANTEES OF THE SIXTH AMENDMENT AND
THE SPEEDY TRIAL ACT. WITH ALL THE SAFETY
PRECAUTIONS, GOV. COULD HAVE INDICT ME ON TIME.
(SEE STANDING ORDER.) **1 OF 15** (ADD CEASE + DESIST ORDER)

THE FACTS SUPPORTING THIS MOTION TO DISMISS ARE BASED ON PRE-ARRESTMENT DELAY CAUSED BY THE GOVERNMENT ARE INTENTIONAL DELAYS CALCULATED TO HAMPER THE DEFENSE. THE ULTIMATE RESPONSIBILITY FOR AN ON-TIME INDICTMENT RESTS WITH THE GOVERNMENT RATHER THAN THE ACCUSED. THIS CASE IS A NON-COMPLEX CASE. I WAS ARRESTED OCTOBER 18, 2020, AT MY HEARINGS ON OCTOBER 26, 2020 THE U.S. ATTORNEYS WERE ORDERED TO INDICT ME AS SOON AS POSSIBLE, IT IS NOW JANUARY 19 2021, OVER NINETY (90) DAYS I HAVE BEEN INCARCERATED WITHOUT AN INDICTMENT. WITHIN THE FIRST SIXTY (60) DAYS AN INDICTMENT MUST BE DONE, THE TOLLING STARTED WHEN I WAS ARRESTED, OCTOBER 18, 2020. (SEE 18 USC § 3161(b)), IF NO INDICTMENT IS FILED WITHIN THE TIME LIMIT AND NO LEGITIMATE EXTENSIONS BY 18 USC § 3161(h) IS FILED, SUCH CHARGE AGAINST THAT INDIVIDUAL CONTAINED IN SUCH COMPLAINT SHALL BE DISMISSED.

I MY CASE THERE WERE NO LEGITIMATE EXTENSIONS UNDER 18 USC § 3161(h) OTHER THAN THE BLANKET PANDEMIC STANDING ORDERS THAT ARE REASONABLY JUSTIFIABLE AND CANNOT PUT AWAY THE CONSTITUTIONAL GUARANTEES OF THE FEDERAL CONSTITUTION THAT ARE GUARANTEED DURING GOOD AND BAD TIMES. (INCORPORATED DEC. 7, REPLY BRIEF)

UNITED STATES SUPREME COURT VIEWS ON THE SPEEDY TRIAL RIGHTS UNDER THE FEDERAL CONSTITUTION SIXTH AMENDMENT (173 L. Ed 2d 1335), THE COURT HAS INDICATED IN THE FOLLOWING CASES THAT DISMISSAL OF THE CHARGES AGAINST ACCUSED IS THE ONLY POSSIBLE REMEDY FOR DENIAL OF THE ACCUSED'S SPEEDY TRIAL RIGHT UNDER THE FEDERAL CONSTITUTION'S SIXTH AMENDMENT. BANKER V WINGO 407 U.S. 514 92 S Ct 2182 33 L. Ed 2d 101 (1972); STRUNK V. UNITED STATES (1973) 412 U.S. 434 93 S Ct 2260 37 L Ed 2d 56 1973 U.S. LEXIS 54; UNITED STATES V. SCOTT (1978) 437 U.S. 82 98 S Ct 2187 57 L Ed 2d 65 1978 U.S. LEXIS 109.

THE UNITED STATES SUPREME COURT HAS HELD PREINDICTMENT DELAY IN A CRIMINAL PROCEEDINGS CONSTITUTE VIOLATION OF THE FEDERAL CONSTITUTION'S SIXTH AMENDMENT. SMITH V. UNITED STATES (1957) 360 U.S. 1 LEXIS 850; DILLINGHAM V. UNITED STATES (1975) 423 U.S. 64 LEXIS 97; BAKER V. MC COLLAN (1979) 443 U.S. 137 LEXIS 141.

IN THE BAKER CASE, DELAY FOR AN UNCOMPLEX CRIME IS LESS TOLERATED THAN A COMPLEX CRIME, LIKE A CONSPIRACY CASE. MY CASE IS AN UNCOMPLEX CASE THEREFORE NO TOLERANCE IS WARRANTED.

IN THE STRUNK CASE, THE PUBLIC INTERESTS IN A BROAD SENSE AS WELL AS THE CONSTITUTIONAL GUARANTEE OF THE RIGHT TO A SPEEDY TRIAL COMMANDED prompt DISPOSITION OF CRIMINAL CHARGES. IN MY CASE THE GOVERNMENT VIOLATED PUBLIC INTERESTS AND TRUSTS BY FAILING prompt DISPOSITION OF MY CASE.

THE BALANCE TEST IS ① LENGTH OF DELAY ② REASON ③ ASSERTION OF RIGHT ④ PREJUDICES. MY CLAIM IS PREJUDICEMENT DELAY, AND BY STATUTORY LANGUAGE, MY CASE IS REQUIRED TO BE DISMISSED. I DID NOT APPROVE CONTINUANCES AND OVER 60 DAYS I DID NOT FILE MOTIONS AND I HAVE NO KNOWLEDGE OF ANY OTHER FILINGS DURING THAT TIME.

THE LENGTH OF TIME IS NOW OVER 90 DAYS. THE COURT COULD HAVE INDICT ME ON TIME.

THE REASON IS THE BLANKET STANDING ORDERS, AS TO WHICH CANNOT PUT AWAY CONSTITUTIONAL GUARANTEES.

I ASSERTED MY RIGHTS WITH MY SPEEDY TRIAL LETTERS OF 12/14/2020, FILED 1/4/2021, A LETTER TO DOUGLAS SUGGESTING MY APPOINTED ATTORNEY OF 12/25/2020, A U.S. SUPREME COURT WRIT OF 1/4/2021, A THIRD CIRCUIT APPEALS COURT WRIT OF 1/9/2021, MY CORRESPONDANCE LETTER OF 1/9/2021 TO JUDGE RAJAN,

DOUGLAS SUGHRUE, THE U.S. ATTORNEY, AND THE COURT CLERK, AND THE LETTER AND MOTION REQUESTS TO MY ATTORNEY DOUGLAS SUGHRUE OF 1/17/2021.

PREJUDICES ARE:

1. SERIOUSLY INTERFERING WITH MY LIBERTY, INCARCERATION.
2. DISTURBING MY EMPLOYMENT AND LLC, MY COMPANY.
3. DRAINING MY FINANCIAL RESOURCES, NO INCOMING MONEY.
4. CURTAILING MY ASSOCIATIONS, LOSS OF FIANCÉ.
5. SUBJECTING ME TO PUBLIC OBLIQUY. I WAS PUBLICIZED.
6. CREATING ANXIETY IN ME, MY FAMILY AND MY FRIENDS.
7. I REMAIN UNDER CONSTANT THREAT THAT THE STANDING ORDERS WILL CHANGE AND I WILL BE INCARCERATED INDEFINATELY, WITHOUT INDICTMENT OR TRIAL AND THE CONSTITUTION WILL DISAPPEAR, THIS IS EMERGENT CIRCUMSTANCES.

DELAYS DEPEND ON A CASE TO CASE ANALYSIS, INVOCATION OF THE SPEEDY TRIAL PROVISION WAS NOT REQUIRED TO WAIT INDICTMENT, THE ARREST ENGAGED THE SPEEDY TRIAL ACT.

PREJUDICES IS TO BE ASSESSED IN LIGHT OF THE INTERESTS OF THE ACCUSED THAT THE SPEEDY TRIAL RIGHT WAS DESIGNED TO PROTECT. PURPOSE OF THE 6TH AMENDMENT IS

- ① PREVENT OPPRESSIVE PRETRIAL INCARCERATION
- ② MINIMIZING ACCUSED'S ANXIETY AND CONCERN

③ Most serious interest, which was limiting the possibility that the defense would be impaired.

The U.S. Supreme Court said in MOORE V. ARIZONA 1973 414 U.S. 94 S Ct 188 38 L Ed 2d 183 1973 U.S. LEXIS 170, None of the factors ... [length, reason, repetition, prejudice] was either a necessary or sufficient condition to find a deprivation of the speedy trial right. The Court said that the related factors, which had no talismanic qualities, had to be considered together with such other circumstances as might be carried out in full recognition that the accused's interests in a speedy trial was specifically affirmed in the Constitution.

In my case the government acted with intentional delays calculated to hamper my defenses and mischaracterizes my words to keep me in jail and took all my defense evidence and delays my case all to prevent me from forming and presenting a defense. This is evident in there actions of postponing the case, confiscation of my property 2 days before hearings, and mischaracterizing my writings and adding words to create a crime and prevent release.

THE BLANKET "STANDING ORDERS" OF THE FEDERAL COURTS AND "EMERGENCY ORDERS" OF THE STATES HAVE BEEN KNOCKED DOWN AND DISREGARDED, INVALIDATED, WHEN IT COMES TO CONSTITUTIONAL RIGHTS GUARANTEED BY FEDERAL CONSTITUTION.

THE SUPREME COURT CASE OF ROMAN CATHOLIC DIOCESE V. CUNIO 208 L. ED 2d 206 2020 U.S. LEXIS - S. CT. - 2020 WL 6948354 (U.S. NOVEMBER 25, 2020) IS RELEVANT TO EVERYONE'S CONSTITUTIONAL RIGHTS, AND TO ALL RIGHTS. THE COURT RECOGNIZED "MEMBERS OF THE COURT ARE NOT PUBLIC HEALTH EXPERTS AND SHOULD RESPECT THE JUDGEMENT OF THOSE WITH SPECIAL EXPERTISE AND RESPONSIBILITY IN THIS AREA. BUT EVEN IN A PANDEMIC THE CONSTITUTION CANNOT BE PUT AWAY AND FORGOTTEN."

IN THE EIGHTH CIRCUIT U.S. COURT OF APPEALS IN CARSON V. SIMMON, 2020 U.S. App LEXIS 34184 (OCTOBER 27, 2020 CASE NOS. 20-3137) 978 F. 3d 1051, THE COURT HELD "THERE IS NO PANDEMIC EXCEPTION TO THE CONSTITUTION"

IN THE U.S. DISTRICT COURT FOR THE DISTRICT OF SOUTH DAKOTA, NORTHERN DIVISION, 2020 U.S. DIST. LEXIS 243175 (DECEMBER 28 2020, CASE NOS. 1220 -CV-0023 - CBK) THE COURT HELD, "THE FEDERAL CONSTITUTION WHILE FLEXIBLE, DOES NOT ALLOW A BLANKET REFUSAL TO AFFORD DEFENDANTS THEIR RIGHT TO A SPEEDY TRIAL." (KURTENBACH V. HOWELL)

IN THE UNITED STATES DISTRICT COURT FOR THE
CENTRAL DISTRICT OF CALIFORNIA SOUTHERN DISTRICT, UNITED
STATES V. OLSEN, 2020 U.S. DIST. LEXIS 193045

CASE NO. SACR 17-00076-CJC, THE CHARGES DISMISSED,
THE OVERVIEW - THE CHARGES AGAINST DEFENDANT WERE
DISMISSED WITH PREJUDICE BECAUSE DEFENDANT WAS
DEPRIVED OF HIS CONSTITUTIONAL RIGHT TO A PUBLIC AND
SPEEDY TRIAL PURSUANT TO SIXTH AMENDMENT WHICH
WAS GUARANTEED BY THE CONSTITUTION DURING ALL TIMES
GOOD AND BAD... IT IS NOT A QUESTION OF IF THE COURT
SHOULD HAVE HELD DEFENDANT CRIMINAL JURY TRIAL
DURING THE STAGE OF THE PANDEMIC, BUT A QUESTION
OF HOW THE COURT COULD HAVE HELD IT.

IN THE UNITED STATES DISTRICT COURT OF
THE WESTERN DISTRICT OF PENNSYLVANIA, COUNTY
OF BUTLER ET AL. V. THOMAS W. WOLF ET AL., 2020
U.S. DIST. LEXIS 167544 - SEPTEMBER 14, 2020

CASE NO. 2020-CV-677. THE COURT HELD THE
"EMERGENCY ORDERS" VIOLATED THE 1ST AMENDMENT
AND THE 14TH AMENDMENT DUE PROCESS AND EQUAL
PROTECTION AND DISTRICT ASSEMBLY CLAUSES.

IN UNITED STATES V. LEV 2020 DIST LEXIS
90534 2020 WL 2615477 (D.N.J. MAY 22
2020) THE COURT SAID UNLESS A REASON FOR
DISREGARDING OR INVALIDATING STANDING
ORDERS 20-02 AND 20-03 EXISTS... THE DEFENDANTS
POSITION MUST FAIL...

THE THIRD EXTENSION OF STANDING ORDERS, AS WITH THE PREVIOUS STANDING ORDERS, ARE BASED ON SECULAR EVIDENCE THAT IS SUPPORTED BY DISCRETIONARY WORDS THAT ARE NOT DEFINITIVE. THE ORDERS ARE BASED ON "ADVISE" AND "POSSIBILITIES" OF A "POLICY" AND 3RD PARTY "DIRECTIVES" BASED ON 3RD PARTY "STATISTICS" AND "RECOMMENDATIONS". IT ALSO SINGLES OUT "THOSE WHO ARE AT INCREASED RISK OF COVID-19 DUE TO AGE OR OTHER REASON" AND THESE WHO FACE "CHALLENGES" AND "SERIOUS IMPACT" BECAUSE OF COVID-19. THE COURT CONCLUDED THAT IN ORDER TO EITHER "PUBLIC SAFETY" OF THE OTHERS, MY SAFETY AND CONSTITUTIONAL GUARANTEES CAN BE THROWN AWAY INDEFINITELY, MY LIBERTY TAKEN WITHOUT INDICTMENT OR TRIAL. THE ORDERS ARE BIAS TO ACCUSED, I AM INNOCENT UNTIL PROVEN GUILTY, TO TREAT ME LESS THAN OTHERS IS BIAS. THE COURT VOLUNTARILY CAUSED ITS OWN PROBLEMS AND I SHOULD NOT PAY THE PRICE. GRAND JURIES HAVE BEEN GOING ON, THE PANDEMIC CANNOT BE USED FOR AN EXCUSE. THE COURT COULD HAVE INDICTED ME AT THE TIME BUT CHOSE NOT TO BECAUSE OF A VIRUS THAT HAS A VACCINE, TREATMENT, 96% SURVIVAL RATE, AND ONLY A SELECTIVE FEW ARE AT RISK. THE STANDING ORDERS VIOLATE THE EQUAL PROTECTION, DUE PROCESS, SPEEDY TRIAL, CLAUSES OF THE FEDERAL CONSTITUTION.

THE VIOLATION OF "GOALS" OF "UNITY" "PROTOCOLS"
AND THE PROTECTION OF "THOSE" CITIZENS ONLY
OVER OTHERS' UNALIENABLE RIGHTS GUARANTEED
BY THE FEDERAL CONSTITUTION, MY SPEEDY TRIAL
ACT AND 6TH AMENDMENT RIGHTS, AND MY LIBERTY,
AND OTHERS SIMILARLY SITUATED, DOES NOT SERVE
JUSTICE. IT IS A MISCARriage OF JUSTICE.

THE ENDS OF JUSTICE ARE NOT SERVED BY
THE STANDING ORDERS CONTINUANCES TO INCLUDE
THE SPEEDY TRIAL ACT AND THESE
CONTINUANCES DOES NOT OVERWEIGH THE
INTERESTS OF THE PUBLIC.

I AM THE "PUBLIC" AND MY RIGHTS
ARE JUST AS HEAVY AS ANOTHER PERSON'S RIGHTS.
MY LIBERTY INTERESTS, AND OTHERS SIMILARLY SITUATED,
ARE NOT INCLUDED IN THE STANDING ORDERS,
WHEREFORE, THE STANDING ORDERS ARE BIAS.

"...IN A PANDEMIC THE CONSTITUTION CANNOT
BE PUT AWAY AND FORGOTTEN" CUOMO CASE, U.S.
SUPREME COURT, "THERE IS NO PANDEMIC EXCEPTION
TO THE CONSTITUTION" THE CARSON CASE, 8TH CIR/1ST
U.S. APPEALS CIR., "THE FEDERAL CONSTITUTION...
DOES NOT ALLOW A BLANKET REFUSAL TO AFFORD
DEFENDANTS THEIR RIGHT TO A SPEEDY TRIAL"
THE VERTENBACH CASE U.S. DISTRICT COURT S.D.N.Y.,
THE WOLF CASE, EMERGENCY VIOLATED
1ST AND 14TH AMENDMENTS.

IN THE Olsen CASE COURT SAID IT IS NOT A QUESTION OF IF THE COURT SHOULD HAVE HELD DEFENDANT'S CRIMINAL JURY TRIAL DURING THIS STAGE OF THE PANDEMIC, BUT A QUESTION OF HOW THE COURT COULD HAVE HELD IT.

SIMILARLY IN MY CASE, IT IS NOT A QUESTION OF IF THE COURT SHOULD HAVE INDICTED ME ON TIME DURING THIS STAGE OF THE PANDEMIC, BUT A QUESTION OF HOW THE COURT COULD HAVE INDICTED ME ON TIME (I INCORPORATE DOC. #7; MY REPLY)

THE STANDING ORDERS STATES ALL COURTHOUSES MAINTAIN THE WEARING OF FACE COVERINGS, ESTABLISHED COVID-19 PROTOCOL FOR ALL ENTRANTS AND INSTITUTE TEMPERATURE SCREENINGS, SOCIAL DISTANCING, LIMITED ELEVATOR OCCUPANCY, AND THE USE OF TELEPHONE CONFERRING. THE COURT CONTINUES TO MAINTAIN ITS OPERATIONS AND MINIMIZES CONTACT BETWEEN PERSONS, ALL AT THE SAME TIME PRESERVING ITS CORE MISSION OF SERVING THE PUBLIC THROUGH THE FAIR AND IMPARTIAL ADMINISTRATION OF JUSTICE.

THE COURT, WITH ALL THE LIMITS, COULD HAVE INDICTED ME ON TIME, MY CASE IS NOT A COMPLEX CASE, THE 6TH AMENDMENT IS GUARANTEED IN GOOD TIMES AND BAD, THERE IS NO PANDEMIC EXCEPTION TO THE CONSTITUTION, AND IT CANNOT BE PUT AWAY. THE STANDING ORDERS MUST BE DISREGARDED, INVALIDATED IN MY CASE.

IN THE WOLF CASE THIS U.S. SUPREME COURT W.D. PR. SAID ORDINARY CONSTITUTIONAL SCRUTINY IS NECESSARY TO MAINTAIN THE INDEPENDENT JUDICIARY'S ROLE AS A GUARANTOR OF CONSTITUTIONAL LIBERTIES - EVEN IN AN EMERGENCY. THE APPLICATION OF NORMAL SCRUTINY WILL ONLY REQUIRE THE GOVERNMENT TO RESPECT THE FACT THAT THE CONSTITUTION APPLIES EVEN IN TIMES OF EMERGENCY. THE APPLICATION OF NORMAL SCRUTINY WILL ONLY REQUIRE THE GOVERNMENT TO RESPECT THE FACT THAT THE CONSTITUTION APPLIES EVEN IN TIMES OF EMERGENCY, AS THE SUPREME COURT HAS OBSERVED "[T]HE CONSTITUTION WAS ADOPTED IN A PERIOD OF GRAVE EMERGENCY. ITS GRANTS OF POWER TO THE FEDERAL GOVERNMENT AND ITS LIMITATIONS OF POWER OF THE STATES WERE DETERMINED IN THE LIGHT OF EMERGENCY, AND THEY ARE NOT ALTERED BY EMERGENCY" HAME BUILDING & LUMBER ASSN. V. BLAISDELL, 290 U.S. 302, 425, 54 S.Ct. 231, 78 L. Ed. 413 (1934). COURTS HAVE A DUTY TO FULLY EXAMINE AND ADDRESS ISSUES LEGITIMATELY BROUGHT TO THEM BY THE INDICES AND FAILURE TO DO SO IN THE NAME OF RESTRAINT MAY VERY WELL CONSTITUTE A DERELICTION OF DUTY SEE CITIZENS UNITED V. FEC, 558 U.S. 310, 317, 130 S.Ct. 876, 175 L. Ed. 2d 753 (2010) ("IT IS NOT JUDICIAL RESTRAINT TO ACCEPT AN UNBROAD, NARROW ARGUMENT

JUST SO THE COURT CAN AVOID ANOTHER ARGUMENT WITH BOULDER IMPLICATIONS. INDEED, A COURT WOULD BE RECESS IN PERFORMING ITS DUTIES WERE IT TO ACCEPT AN UNSOUND PRINCIPLE MERELY TO AVOID THE NECESSITY OF MAKING A BOLDER RULING."

HERE THE COURT CANNOT, CONSISTENT WITH ITS MOST FUNDAMENTAL DUTIES, AVOID ADDRESSING THE ISSUES RAISE BY ME, THE DEFENDANT, RELATIVE TO ALL THE CONTENT OF THE COURT'S, THE ATTORNEYS, ALL THE CASES INVOLVED THAT ARE CONNECTED TO THE CASE AND ARE THE CAUSE OF MY ACTIONS; AND THE FACT THAT MY ACTIONS ARE PETITIONS AND THIS IS A FIRST AMENDMENT CASE; TO ALL MY WRITINGS TO THIS COURT AND ALL OTHER COURTS; AND TO MY APPOINTED COUNSEL; AND THE CASES QUOTED HEREIN; ALL SUPPORT MY MOTION TO DISMISS THIS CASE FOR VIOLATIONS OF MY CONSTITUTIONAL, PROTECTED AND GUARANTEED RIGHTS, SIXTH AMENDMENT AND THE SPEEDY TRIAL ACT AND FIRST AMENDMENT.

(WOLF) THE COURT IS GUIDED IN THIS FULCRUM EMERGENCY MEASURES BY PRINCIPLES OF ESTABLISHED CONSTITUTIONAL JURISPRUDENCE. A COURTEEN CAN NOT BE PERMITTED TO UNDERMINE OUR SYSTEM OF CONSTITUTIONAL LIBERTIES OR THE SYSTEM OF CHECKS AND BALANCES PROTECTING THOSE LIBERTIES. THE GREATEST THREATS TO CONSTITUTIONAL LIBERTIES IS WHEN THE ENDS ARE LAUDABLE AND THE INTENT IS GOOD - ESPECIALLY IN AN EMERGENCY.

IN MY CASE I HAVE CLAIMED PREJUDICIAL
 DELAY, VIOLATIONS OF THE SPEEDY TRIAL ACT AND
 THE 6TH AMENDMENT GUARANTEES WITH SUBSTANTIAL
 CONSTITUTIONAL REASONS TO DISREGARD AND INVALIDATE
 STANDING ORDERS 20-02 AND 20-03, AND ANY
 OTHER STANDING ORDER, THAT IS USED AS AN
 EXTENSION UNDER 18 USC § 3161(b) TO DENY MY
 CONSTITUTIONAL RIGHT TO SPEEDY TRIAL PURSUANT TO
 THE 6TH AMENDMENT WHICH WAS GUARANTEED BY
 THE CONSTITUTION DURING ALL TIMES GOOD AND BAD,
 TO INCLUDE TIME LIMITS FOR INDICTMENTS, SUPPORTED
 BY U.S. SUPREME COURT, U.S. APPEALS COURT, AND
 U.S. DISTRICT COURT DECISIONS AND THE CONSTITUTION
 OF THE UNITED STATES. THE FORENOMIC ORDERS DO NOT SERVE JUSTICE.

THEREFORE, FOR ALL THE REASONS PRESENTED,
 FOR VIOLATION OF 18 USC § 3161(b), FAILURE
 TO INDICT ON TIME, THE CRIMINAL COMPLAINT
 IS REQUESTED TO BE DISMISSED, DISREGARDING
 THE STANDING ORDERS. ENFORCING CRIMINAL TIME
 GUARANTEES. FORENOMIC ORDERS DO NOT OUTWEIGHT FEDERAL RIGHTS.

I SWORN UNDER PENALTY OF PERJURY
 THE STATEMENTS HEREIN ARE TRUE TO THE BEST
 OF MY KNOWLEDGE AND BELIEF.

DATED 1/23/2021 By: William F. Fitz
 William F. Fitz

CERTIFICATE OF SERVICE

I CERTIFY UNDER PENALTY OF PERJURY I
SERVED THIS MOTION TO DISMISS FOR VIOLATION OF
THE 6TH AMENDMENT AND SPEEDY TRIAL ACT BY
FIRST CLASS MAIL TO:

UNITED STATES DISTRICT COURT
WESTERN DISTRICT PENNSYLVANIA

- ① ATTENTION: COURT CLERK
- ② ATTENTION: TONYA S. GOODMAN (SUITE 4000), PLEASE SERVE VIA PACER
- ③ ATTENTION: JUDGE RANJAN
JOSEPH F. WEIS JR. U.S. COURT HOUSE
700 GRANT STREET
PITTSBURGH PA 15219

SUGHVUE LAW
DOUGLAS SUGHVUE
429 FOURTH AVE
SUITE 501
PITTSBURGH PA 15219

DATE: 1/23/2021 BY: William F. Kaefer
WILLIAM F. KAEFER